

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. CR-11-20723

v.

Judge Nancy G. Edmunds

CHARLIE GOLDEN,

Sentencing Date: June 12, 2012

Defendant.

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**GOVERNMENT'S SENTENCING POSITION
AS TO DEFENDANT CHARLIE GOLDEN**

The government submits the following memorandum in connection with the sentencing of defendant Charlie Golden on June 12, 2012. The government recommends that defendant be sentenced to a term in prison of between 10 and 16 months, along with a one-year period of supervised release.

I. Statutory Factors

As the Court is aware, Title 18, United States Code, Section 3553(a) requires the Court to impose a sentence which is sufficient, but not greater than necessary to comply with the purposes set forth in that section. The government will summarize the statutory factors most applicable to this case.

A. The Nature and Circumstances of the Offense

Defendant, as Assistant Superintendent of Buildings for the City of Detroit, solicited and accepted a \$10,000 bribe from a City contractor who, unbeknownst to defendant, was wearing a concealed video recorder and acting under the direction of the FBI.

Defendant maintained that he intended to use the money to install a range hood and fan over a deep fryer at a church owned and operated by defendant. To cover the expense of the bribe, defendant falsified invoices so that the City of Detroit would in effect reimburse the contractor for the bribe.

B. History and Characteristics of the Defendant

Defendant had no criminal record before he pleaded guilty to the offense in this case. Since being contacted by law enforcement, he has promptly accepted responsibility for his conduct.

C. Seriousness of the Offense, Promoting Respect for the Law, Providing Just Punishment, and Affording Adequate Deterrence

Defendant's conduct as a public official who solicited a bribe and then planned to get the City to pay for it is no doubt serious.

There is a need for a sentence that is sufficient to deter other public officials from committing similar violations of the public trust.

D. Kinds of Sentences Contemplated by the Sentencing Guidelines

The parties have agreed that the correct calculation of defendant's Sentencing Guidelines range to be 10-16 months.

CONCLUSION

Based on the foregoing, the government recommends that the Court sentence defendant to a sentencing within the agreed upon guideline range of 10-16 months.

Respectfully submitted,

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Dated: June 11, 2012

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2012, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

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